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RECEIVED

JAN 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

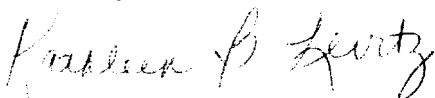
Re: Written Ex Parte in CC Docket No. 98-121 /
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of copies of two documents filed with the Georgia Public Service Commission on January 24, 2000. The first document is KPMG's "Open Letter to the Georgia CLEC Community", inviting that community to participate in a meeting on February 1, 2000 to initiate a weekly conference call on the status of the BellSouth-Georgia OSS evaluation effort. The second document is the "proposed Supplemental Test Plan Version 1.0, which provides for additional testing of BellSouth's OSS as directed by the Georgia Commission's January 12, 2000 Order.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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List ABCDE

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WRITTEN EX PARTE

Ms. Claudia Fox
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RECEIVED
JAN 27 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached are copies of two documents that were filed with the Georgia Public Service Commission on January 24, 2000. The first, filed by KPMG, is an "open Letter to the Georgia CLEC Community," inviting the CLEC Community to participate in a meeting on February 1, 2000, to initiate a weekly conference call on the status of the BellSouth-Georgia OSS Flow-Through Evaluation Plan. The second document, filed by BellSouth, is the "Proposed Supplemental Test Plan Version 1.0, which proposes additional KPMG testing of BellSouth's OSS as directed by the Georgia Commission's January 12, 2000 Order. I am sending this filing to you in response to the request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the revision, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Agee
Jake Jennings



303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

January 24, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

RECEIVED

JAN 24 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's "Open Letter to the Georgia CLEC Community" for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record





303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

January 20, 2000

AN OPEN LETTER TO THE GEORGIA CLEC COMMUNITY

KPMG and the Georgia Public Service Commission (GAPSC) invite you to attend a CLEC meeting from 3-5pm on Tuesday, February 1, 2000 in the board room on the 20th Floor of the SunTrust Plaza Building at 303 Peachtree Street NE in Atlanta. If you would like to take part, but cannot attend in person, you may participate via conference call.

During this meeting, KPMG will announce arrangements for a weekly CLEC conference call to discuss the status of the BellSouth – Georgia OSS Evaluation, including test progress, exception resolution and other relevant developments.

If you would like to participate in this CLEC meeting, either in person or via conference call, please contact Christopher Casey of KPMG by Friday, January 28, 2000 at:

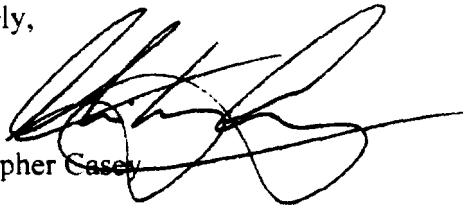
Christopher Casey
KPMG
270 Peachtree Street, NE, 10th Floor
Atlanta, GA 30308
Phone: (407) 492-7867
E-mail: Christophercasey@kpmg.com

In addition, KPMG will file the *BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan* (STP) with the GAPSC on Monday, January 24, 2000. Subsequently, KPMG will receive comments on the STP from CLECs through the close-of-business on February 3, 2000.

Comments must be made in writing and may be submitted to Christopher Casey at the business or e-mail address above.

Thank you for your interest. We look forward to your participation.

Sincerely,


Christopher Casey
KPMG



KPMG LLP, a U.S. limited liability partnership
a member of the KPMG network, a Swiss association

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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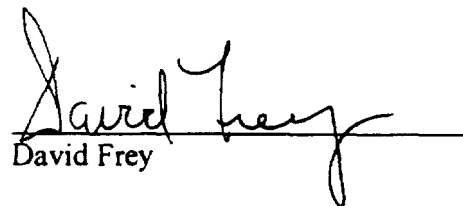
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Fred McCallum, Jr.
125 Perimeter Center West
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This 24th day of January 2000.


David Frey

KPMG
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(404) 222-3000

Fred McCallum Jr.
General Counsel

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Telephone 404.393.6000
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January 24, 2000

RECEIVED

JAN 24 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

DELIVERED BY HAND

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334-5701

Re: *In re: Investigation Into Development of Electronic Interfaces for
BellSouth's Operations Support Systems; Docket No. 8354-U*

Dear Ms. O'Leary:

Pursuant to the Commission's January 12, 2000 Order in the above-referenced docket, BellSouth hereby files an original and twenty-six copies, as well as an electronic version, of the Proposed Supplemental Test Plan (STP), Version 1.0, for filing in the above-referenced matter.

In accordance with the Georgia Public Service Commission's (GPSC) January 12, 2000 Order, this STP provides a description of a plan for additional KPMG tests of BellSouth OSS systems, interfaces, and processes, beyond those described in the GPSC-approved Master Test Plan. BellSouth's proposed list of products and services for resale functional evaluation, referenced in Appendix B, will be filed with the GPSC no later than January 28, 2000.

In its Order, the Commission required BellSouth to set forth a plan to perform "functional testing of resale pre-ordering, ordering, provisioning, maintenance, and repair billing transactions for the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage."

BellSouth also understood the cited provision of the Commission's Order to include testing of provisioning, maintenance and repair, and billing for each of the resold services in question. BellSouth respectfully requests that the Commission reconsider this portion of its directive because BellSouth has a significant level of commercial usage in each of these three areas for resold services. Thus, any additional testing would be

Ms. Helen O'Leary
January 24, 2000
Page Two

duplicative; moreover, it is unnecessary given the FCC's position that "the most probative evidence that OSS functions are operationally ready is actual commercial usage." *In the matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region InterLATA Service in the State of New York*, CC Docket No. 99-295, Released December 22, 1999, at ¶ 89; see also, *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20655; *BellSouth South Carolina Order*, 13 FCC Rcd at 593; *Ameritech Michigan Order*, 12 FCC Rcd at 20618.

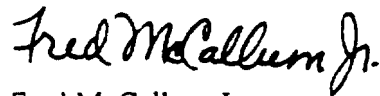
As the Commission knows, once a Local Service Request (LSR) or a BellSouth retail request completes the pre-ordering and ordering process, the LSR is entered into a common point known as the Service Order Communications System (SOCS). All LSRs, regardless of the entry path into BellSouth (i.e., TAG, EDI, LENS, or manual) enter SOCS. Moreover, BellSouth's retail Orders enter SOCS as well. Beyond SOCS, the provisioning, maintenance and repair, and billing system is common for all resale and retail services. Thus, every Order that flows from SOCS to BellSouth's provisioning, maintenance and repair, and billing systems constitutes commercial volume for these systems. It follows, then, that BellSouth has extensive commercial resale volumes over its provisioning, maintenance and repair, and billing systems and no further testing is necessary. BellSouth's Flow-Through Report substantiates the commercial volumes; specifically, the Flow-Through Report has over 141,000 electronically submitted LRSs, of which more than 139,000 were resale as of December, 1999.

In other words, all of BellSouth's retail and resale services go to SOCS, and from SOCS to the same provisioning, maintenance and repair, and billing systems. Thus, we can rely on the commercial usage from frequently resold services and BellSouth's retail services as evidence of functionality for the provisioning, maintenance and repair, and billing systems for resold services without specific commercial usage for particular services. There is no need to do additional testing for the systems after SOCS. As the Commission stated in its initial Order, "its intent in ordering third-party testing is to conduct a focused, supervised audit of BellSouth's OSS." Initial Order, Docket No. 8354-U, June 28, 1999, at 1. Conducting Additional testing of the provisioning, maintenance and repair, and billing systems for resold services without extensive commercial volume would be duplicative testing and, therefore, interfere with the Commission's stated purpose in conducting its third-party test.

Ms. Helen O'Leary
January 24, 2000
Page Three

KPMG will accept comments on the Proposed STP from Georgia CLECs and other parties of record for a ten-day period ending on Thursday, February 3, 2000. CLEC comments should be directed by U.S. mail to Christopher Casey at KPMG Consulting, 270 Peachtree Street NE, Suite 1050, Atlanta, GA 30308, by email at christophercasey@kpmg.com, or by telephone at 404-954-5751. I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script that reads "Fred McCallum Jr.".

Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record

194361

RECEIVED

JAN 24 2000

EXECUTIVE SECRETARY
G.P.S.C.

BellSouth Telecommunications, Inc.
OSS Evaluation - Georgia
Supplemental Test Plan

Draft

Version 1.0

Submitted by:
KPMG

Copyrighted 2000

January 22, 2000

AAA

Draft Copy

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I. Document Control

A. Distribution

Table I-1: Distribution List for Document

Contact	Organization	Date Sent
David Burgess	Georgia Public Service Commission	
Leon Bowles	Georgia Public Service Commission	
Dennis Sewell	Georgia Public Service Commission	
Kathy Wilson-Chu	BellSouth	
Milton McElroy	BellSouth	
William Stacy	BellSouth	
Bennett Ross	BellSouth	
Claudia Fox	FCC	
Lisa Harvey	Florida Public Service Commission	
Stephanie Folse	Louisiana Public Service Commission	
Brent Marshall	US Department of Justice	
Anu Seam	US Department of Justice	
Frances Marshall	US Department of Justice	
Raymond Sears	KPMG	
Michael Weeks	KPMG	
David Frey	KPMG	
Chuck King	KPMG	
Mike Adderly	KPMG	
Carrie Thielemann	KPMG	
Ted Glickman	KPMG	
Gregory Pulaski	KPMG	
Elizabeth Fuccillo	KPMG	
Terry Trudgian	KPMG	
Brian Rutter	KPMG	

B. Approved By

Table I-2: Approval List for Document

Person	Department	Date
David Burgess	Georgia Public Service Commission	

Table I-3: Version Control

Version	Date	Reason
1.0	January 22, 2000	Initial Draft Release

II. Introduction

A. Background

The Telecommunications Act of 1996 (the Act) requires BellSouth Telecommunications, Inc. (BLS) in Georgia to:

- ☐ Provide just, reasonable, and nondiscriminatory access to its operations support systems (OSS);
- ☐ Provide the documentation and support necessary for competitive local exchange carriers (CLECs) to access and use these systems; and
- ☐ Demonstrate that BLS's systems are operationally ready and meet prescribed performance standards.

Compliance with these requirements will allow competitors to obtain pre-ordering information, submit service orders for resold services and unbundled network elements (UNEs), submit trouble reports, and obtain billing information at a level deemed to be nondiscriminatory when compared with BLS's retail operations.

Georgia Public Service Commission (GAPSC) and BLS have directed KPMG LLP (KPMG) to design and execute this Supplemental Test Plan. This test, in combination with additional OSS evaluations executed under the direction of the GAPSC and described in *BellSouth - Georgia OSS Evaluation Master Test Plan* (Master Test Plan) will assist the GAPSC in assessing whether BLS is meeting the requirements of the Act.

B. Scope

This document describes the plan to evaluate BLS's OSS systems, interfaces, and processes that enable CLECs to compete with BLS for customers' local telephone service, beyond the scope of activities described by the GAPSC in the Master Test Plan.

The supplemental plan has been divided into four test areas to organize and facilitate testing:

- ☐ Performance Metrics Review
- ☐ Pre-Order, Order & Provisioning
 - Maintenance & Repair (xDSL)
 - Billing
- ☐ Change Management

Within each of the test areas, the methods and processes to be applied to measure BLS's performance are described along with the specific points in the systems and processes



where BLS performance will be evaluated. The results of the test will be compared against measures and criteria identified by the GAPSC and other measures and criteria as deemed appropriate by the GAPSC. This plan also describes the application of scenarios to be used within the Pre-Order, Ordering & Provisioning test family in evaluating BLS's OSS and related support services. KPMG will develop scenarios used in the test to evaluate the functionality of BLS's pre-ordering, ordering, and provisioning systems for resale and xDSL products and services. The scenarios will be designed to depict real-world situations that CLECs currently face or may face in the near future. The scenarios will be developed upon determination of the resale products to be tested, based on the process described in Appendix B. The test will be conducted using the latest BLS interfaces in production for electronic order submission. These interfaces will include TAG (machine-to-machine) and EDI.

This supplemental plan will adopt the military-style test philosophy, which suggests a "test until you pass" approach. This is believed to be in the best interest of all parties seeking an open, competitive market for local services in Georgia.

C. Objective

The overall objective of this document is to provide a description of a plan to test additional BLS OSS systems, interfaces, and processes, beyond those described in the GAPSC-approved Master Test Plan. This Supplemental Test Plan shall be the basis by which individual tests can be developed and executed. The test results will further assist the GAPSC in determining whether BLS's provision of access to OSS functionality enables and supports CLEC entry in the local market. To meet these objectives, KPMG developed this Supplemental Test Plan that will evaluate components of the CLEC/ILEC relationship under real world conditions.

D. Audience

The audience for this document falls into two main categories:

1. Readers using this document during the testing process
2. Interested parties who have some stake in the result of the BLS OSS evaluation and wish to have insight into the evaluation effort

The primary user of this document is KPMG, identified by BLS and the GAPSC as Test Manager. Others are the GAPSC, BLS, the CLECs, the Department of Justice (DOJ), the Federal Communications Commission (FCC), and other State Commissions.

Test Manager

KPMG, as Test Manager, has overall responsibility for the management of the testing process described in this document. This document will be used by KPMG to guide the various parties involved in this testing effort, including any additional entities utilized by KPMG to simulate the CLEC/ILEC relationship.

END

Georgia Public Service Commission

The Georgia Public Service Commission is responsible for providing input on additional tests, measures, or criteria that should be considered. KPMG will provide results and preliminary evaluation of the results to the GAPSC. The GAPSC is responsible for the final evaluation of the test results.

BellSouth

BLS will use this document to understand the supplemental testing framework and requirements in order to prepare for and support test execution.

The CLEC Community

The CLECs will use this document to understand the breadth and depth of the supplemental testing. In addition, this document describes the elements required of the CLECs to prepare for their role in the tests. The terms ALECs and CLECs are synonymous, and the term CLECs will be used throughout this document.

Department of Justice

The Department of Justice may observe the process of developing, conducting, and evaluating the tests.

The Federal Communications Commission

The Federal Communications Commission may observe the process of developing, conducting, and evaluating the tests.

E. Assumptions

This section describes the assumptions made in the development of this Supplemental Test Plan.

- ☐ BLS will provide suitable resources in sufficient numbers to assist KPMG with the evaluation effort.
- ☐ BLS will provide access to appropriate documentation.
- ☐ BLS will provide the necessary resources, facilities, and support for KPMG and/or designated vendor(s) to establish connectivity with its systems and to create the test bed required to execute the tests (e.g., office space; equipment; IDs; security access; customer accounts and addresses; and appropriate company codes).
- ☐ BLS will process test transactions as part of normal processing including the provisioning of some scenarios/test cases.

AAA

- ☐ BLS and, where appropriate, CLECs will provide the facilities required to execute the live scenarios.
- ☐ BLS and, where appropriate, CLECs will allow KPMG to observe retail and wholesale processes on-site during the evaluation effort.
- ☐ BLS and the CLECs will give KPMG access to historical data and current operational reports, as needed, to complete the evaluation.
- ☐ BLS will allow the inspection of algorithms that may have a bearing on parity access.
- ☐ BLS will maintain a stable environment for the duration of the evaluation.
- ☐ Regulatory, legal, and confidentiality issues or concerns can be resolved without significant impact to either the intent of the tests, the ability to execute the tests, or the schedules for their execution.

In some cases, certain order types, troubles, and processes may not be practically tested within the test. Examples include orders with very long interval periods or high volumes of test provisioning transactions. Accordingly, the test may take the form of an interview, inspection, live orders review, review of historical performance or operational reports, or some other method that will capture the performance of BLS with respect to the order types and processes in question. The Test Plans will identify the tests that can be executed live and those that must be executed by other means. Long interval tests that prove to have no alternative test methods that foreshorten the test will be referred, with a recommendation for disposition, to the GAPSC. The GAPSC will make the final decision regarding the disposition of such tests.

Operational, time, and resource constraints make it impossible to construct a completely exhaustive test suite. Provision has been made in the plan to amend or extend the test coverage if, in the judgment of the GAPSC, an amendment or extension is deemed justified.

F. Document Structure

This section describes the structure of the document. It includes a table that lists each major section number along with a brief description.

Table II-1 Document Overview

Sect. No.	Section	Content
I	Document Control	Identifies document distribution and necessary approvals.
II	Introduction to the Document	Documents project background, scope, and objectives, assumptions, and limitations. Includes who should read the document, and how it is structured.

Sect. No.	Section	Content
III	Test Plan Framework	Describes the methodologies for additional testing of BLS's systems, interfaces and processes. Includes how testing is segmented and organized, testing components, entrance and exit criteria, data acquisition, and traceability.
IV	Performance Metrics Review Test Section	Describes the methods and procedures for additional evaluation of BLS's data collection, transfer, and processing into its performance metrics.
V	Pre-Order, Order & Provisioning Test Section	Describes the methods and procedures for verifying and validating BLS's core systems and processes associated with ordering and provisioning resale and xDSL products, and through a series of transaction tests, manually submitted orders, and inspection.
VI	Maintenance and Repair Test Section	Describes the methods and procedures for evaluating BLS's processes for xDSL trouble reporting and repairs, and TAFI and ECTA functionality for resale services.
VII	Billing Test Section	Describes the methods and procedures for evaluating BLS's resale service billing and usage generation systems and processes.
VIII	Change Management Test Section	Describes the methods and procedures for evaluating BLS's processes for, and implementation of, its OSS '99 release.

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III. Test Plan Framework.

The supplemental evaluations of BLS's OSS are designed to build on those described in the Master Test Plan approved by the GAPSC. In constructing a Supplemental Test Plan, many factors were considered, including the systems and processes to be tested, the measurement points and respective evaluation criteria, and the necessary conditions required to stage successful, efficient, and objective evaluations. KPMG will execute all tests listed in this plan.

The supplemental test plan framework was defined along four key dimensions:

- ☐ Test Scenarios
- ☐ Test Domains
- ☐ Test Processes
- ☐ Evaluation Criteria

The test scenarios and the test domains define **what is to be tested**. *Test scenarios* provide the contextual basis for testing by defining the transactions, products, volumes, data elements, and other variables that must be considered and included during testing. The *test domains* define the systems and processes to be tested.

Test processes and evaluation criteria define **how testing will be conducted**. *Test processes* define the techniques, measures, inputs, activities, and outputs of each component test. *Evaluation criteria* serve as the basis for evaluation by defining the norms against which test results are compared.

These concepts are discussed in more detail in the following sections.

A. Test Scenarios

Based on KPMG's industry experience, the knowledge gained from the New York Public Service Commission Test and the Pennsylvania Public Utility Commission Test, as well as a review of the evaluations described in the Master Test Plan, KPMG has developed a representative set of additional test scenarios for evaluation in Georgia.

The test scenarios describe, at a high level, realistic situations in which CLECs purchase wholesale services from BLS to be resold to the CLECs' end-user customers on a retail basis. The key principles applied in generating the additional scenarios include: (1) emulating real world coverage, mix, and types of transactions while (2) balancing the requirement for practical and reasonably executable transactions that would not unduly disrupt normal production or negatively affect customer service. In general, each test scenario describes a real-world situation that will be used to create test cases. A summary of the scenarios will be published in the STP following determination of the products and features to be tested, as described in Appendix B.

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B. Test Domains

The areas subject to testing exist in four domains that mirror major business functions performed by a telecommunications carrier:

- Pre-Order, Order, and Provisioning (POP)
- Maintenance and Repair (M&R)
- Billing (BLG)
- Change Management (CM)

These four domains correspond to four respective business functions that comprise, in part, the BLS/CLEC relationship.

Pre-Order, Order, and Provisioning Domain

This domain is comprised of the systems, processes, and other operational elements associated with BLS's support for Pre-Ordering, Ordering, and Provisioning activities for wholesale services. The purpose of the specified tests is to evaluate resale interface functionality and provisioning processes, to evaluate manual ordering and provisioning processes for xDSL services, to evaluate compliance with prescribed measurements, and to provide a basis for comparing this operational area to parallel systems and processes supporting BLS's Retail Operations.

Maintenance and Repair Domain

This domain is comprised of the systems, processes, and other operational elements associated with BLS's support for Wholesale Maintenance and Repair activities. The purpose of the specified tests is to evaluate Maintenance and Repair activities on resale services and xDSL-capable loops.

Billing Domain

This domain is comprised of the systems, processes and other operational elements associated with BLS's support for Wholesale Billing. The purpose of the specified tests is to evaluate activities for resale service billing and usage generation systems.

Change Management Domain

This domain is comprised of the policies and practices for managing change in the systems, processes and other operational elements necessary for BLS's establishment and maintenance of business relationships with the CLECs. Supplemental test activities in Change Management will focus on an evaluation of BLS's OSS '99 release.

C. Test Processes

Within each of the test domains, specific test processes to be executed have been defined.

In general, two kinds of tests have been developed:

- ☐ Transaction-Driven System Analysis - those that rely on initiation of transactions, tracking of transaction progress, and analysis of transaction completion results to evaluate a system under test.
- ☐ Operational Analysis - those that focus on the form, structure, and content of the business process under study. This test method will be used to evaluate day-to-day operations and operational management practices, including policy development, procedural development, and procedural change management.

CLEC Involvement

CLECs operating in Georgia will be given an opportunity to participate in specified components of this test. The inclusion of selected CLEC live transactions provides an alternative test method for transactions which may not be practical to provide through the test infrastructure, and facilitates a more realistic depiction of real world production. CLEC participation will also be solicited to provide real test cases during the test period.

Additionally, KPMG will organize regularly scheduled meetings with the GAPSC and the CLECs to keep interested parties apprised of all relevant aspects of the test activities described in this Supplemental Test Plan, as well as the activities described in the Master Test Plan.

D. Evaluation Criteria

Measures and their corresponding evaluation criteria provide the basis for conducting tests. Evaluation criteria are the norms, benchmarks, standards, and guidelines used to evaluate measures identified for testing. Evaluation criteria provide a framework for the scope of tests, the types of measures that must be taken during testing, and the approach necessary for analyzing results.

There are four types of evaluation criteria:

Table III-1: Evaluation Criteria

Evaluation Criteria Type	Description	Examples
Quantitative	These criteria set a threshold for performance where a numerical range of values is possible, such as response time.	System response time is four seconds or less.

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Evaluation Criteria Type	Description	Examples
Qualitative	These criteria set a threshold for performance where a range of quality values is possible, such as level of customer satisfaction.	Documentation defining change notification procedures is adequate.
Parity	These are criteria that require two measurements to be developed and compared, such as whether external response time is at least as good as internal response time.	CLEC transaction time is no greater than BLS Retail transaction time.
Existence	These are criteria where only two possible test results can exist (e.g., true/false, presence/absence), such as whether a document exists or not.	Documentation defining change notification procedures exists.

The evaluation criteria to be applied in the overall test effort are based largely on the legal and regulatory requirements for functionality and performance applicable to BLS's OSS. Overall, evaluation criteria are derived from three types of sources, as shown below.

Table III-2: Sources of Evaluation Criteria

Evaluation Criteria Source Types	Description
Legal and Regulatory Requirements	Requirements specified by statute and regulation, such as FCC orders, court orders, GAPSC regulations, federal and state statutes, and other binding requirements resulting from judicial or governmental proceedings.
Consensus Requirements	Norms, benchmarks and standards developed by formal consensus proceedings.
Good Management Practices (GMP)	Widely recognized standards and guidelines promulgated by sanctioned industry and governmental organizations and other bodies (e.g., Telecommunications and Industry Forum); also includes benchmarks, performance goals, and guidelines derived from industry and topic area experts, BLS and CLEC performance targets, publications, academic journals and other sources.

E. Test Process Elements

The test process includes a description of the test, its objectives, the targets and scope of the test, the measures to be used, the test scenarios which apply to the test, the test's inputs, activities, and outputs, as well as entrance and exit criteria. Each test process specifies the evaluation techniques used to capture and analyze information developed during testing and the evaluation measures used to conduct testing.

1.0 Entrance Criteria

Entrance criteria are those requirements that must be met before individual tests can commence. Global entrance criteria, which apply to every individual test (except where noted otherwise), include the following:

1. The Test Plan has been approved.



The Supplemental Test Plan must be approved by the GAPSC.

2. All legal dependencies have been resolved.

Any pending legal and regulatory proceedings that impact the ability to perform the additional test activities must be concluded in a manner, which allow testing to proceed. Any necessary legal or regulatory approvals must be secured.

3. All required BLS interface capabilities must be operationally ready.

Electronic interfaces to all OSS access functions of Pre-Ordering, Ordering, and Provisioning must be fully tested and operational.

For transaction tests to begin, the test infrastructure established for the test activities identified in the Master Test Plan must continue to be operationally ready.

Table III-3: Global Entrance Criteria

Criteria	Responsible Party
The Test Plan has been approved.	GAPSC
All legal dependencies have been resolved.	BLS, GAPSC
Resolutions to legal dependencies approved.	GAPSC
All required BLS interface capabilities must be operationally ready.	BLS
The Interface Test Tool must be operationally ready.	KPMG

2.0 Exit Criteria

Exit criteria are the requirements that must be met before the tests defined in the Test Plan can be concluded.

Global exit criteria, which apply to every individual test (except where noted otherwise), include the following:

1. All test activities required by the test plan must be completed.

For each test, all fact finding and analysis activities must be completed. All results and test methodologies have been documented. Any exceptions must be resolved or re-testing completed, unless specifically exempted by the GAPSC.

2. All change control, verification, and confirmation steps have been completed.

The results of test activities must be documented and reviewed for accuracy. Any results that require clarification or follow-up are confirmed.

In addition to these global exit criteria, test-specific exit criteria, where applicable, are defined within each test.

Table III-4: Exit Criteria

Criteria	Responsible Party
All required test activities must be completed	KPMG
All change control, verification, and confirmation steps have been completed	KPMG

3.0 Evaluation Techniques

Each test relies on one or more techniques to collect and record measurements and analyze the results. The five types of techniques defined for this test are described in the chart below.

Table III-5: Evaluation Techniques

Technique	Description
Transaction Generation	Transaction generation is the use of live, historical, and/or generated data which is executed through the system under review. The results of this test are evaluated for quality.
Report Review	Review and analysis of historical data, reports, metrics, and other information in order to assess the effectiveness of a particular system or business function. This includes performance measurement reports and other management reports.
Inspection	Physical review of process activities and products, including site visits, walk-throughs, read-throughs, and work center observations.
Logging	Monitoring activities and collecting information by logging process events and products as they happen. Logging can be mechanized or manual.
Document Review	Compilation and review of books, manuals, and other publications related to the process and system under study.